



U.S. Department of Justice

Antitrust Division

*Liberty Place Building
325 Seventh Street NW
Washington, DC 20530*

May 19, 2003

HAND DELIVER

Thomas M. Hughes, Esq.
Hunton & Williams
1900 K Street, N.W.
Washington, D.C. 20006

Re: United States v. Smithfield Foods, Inc.

Dear Mr. Hughes:

With this letter, you are receiving Plaintiff's First Set of Interrogatories Relating to Jurisdictional Discovery and its First Request for Production of Documents Relating to Jurisdictional Discovery directed to Smithfield Foods, Inc. ("Smithfield"). In addition, we are enclosing a draft of a Protective Order for your consideration.

You will note that certain of the discovery requests are directed to Smithfield subsidiaries, as well as to Smithfield. Consistent with the Federal Rules of Civil Procedure and the law of this district and others, it is our understanding that the information and documents sought are within the control and ability of Smithfield and that you will produce what has been requested. If you do not intend to produce the requested materials, please advise us promptly.

In view of the tight schedule that we have for jurisdictional discovery, we would appreciate your promptly alerting us to any issues raised by our discovery requests before their due dates so that we can try to resolve them.

Finally, here is a list of those individuals we would like to depose in late June or early July:

C. Larry Pope
Lewis R. Little
Timothy A. Seeley
Joseph Luter, IV
Daniel G. Stevens
Lawrence Shipp
Robert A. Slavik
Aaron Trub

Thank you for your attention to this matter.

Sincerely,
“/s/”
Nina B. Hale

cc: Thomas G. Slater, Jr.
Hunton & Williams
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219-4074